

ROBERT E. SCHUMACHER, ESQ.

Nevada Bar No. 7504

DIONE C. WRENN, ESQ.

Nevada Bar No. 13285

GORDON REES SCULLY MANSUKHANI, LLP

300 South 4th Street, Suite 1550

Las Vegas, Nevada 89101

Telephone: (702) 577-9300

Direct Line: (702) 577-9319

Facsimile: (702) 255-2858

E-Mail: rschumacher@grsm.com

dwrenn@grsm.com

Attorneys for Defendant,

MIDWEST FAMILY MUTUAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ARIZONA CIVIL CONSTRUCTORS, INC., a
Nevada corporation,

Plaintiff,

vs.

COLONY INSURANCE COMPANY; HDI
GLOBAL SPECIALTY SE, fka INTERNATIONAL)
INSURANCE COMPANY OF HANNOVER SE;)
MIDWEST FAMILY MUTUAL INSURANCE)
COMPANY; DOES I-X, inclusive; and ROE)
CORPORATIONS I-X, inclusive,)

Defendants.)

CASE NO. 2:20-cv-00010-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND MIDWEST FAMILY
MUTUAL INSURANCE
COMPANY'S DEADLINE TO
FILE RESPONSE TO
COMPLAINT**

Pursuant to Local Rules 6-1 and 7-1, Defendant MIDWEST FAMILY MUTUAL INSURANCE COMPANY ("Midwest") and Plaintiff ARIZONA CIVIL CONSTRUCTORS, INC. ("ACC") (collectively, the "Parties"), by and through their respective attorneys of record, stipulate as stated below.

STIPULATION

1. ACC filed a Complaint in the Eighth Judicial District Court, Clark County,

Nevada ("State Court") on November 18, 2019.

2. On December 30, 2019, Defendant Colony Insurance Company filed a Notice of Removal in State Court. On the same day, a Notice of Removal was also filed with this Court. ECF No. 1-1.

3. Prior to the removal, Midwest's deadline to file a response to the Complaint was December 30, 2019. Pursuant to FRCP 81(2)(c), Midwest's response deadline became January 8, 2020.

4. Midwest requests additional time to file its response up to and including Wednesday, January 22, 2020.

5. ACC does not oppose Midwest's requested extension.

6. Accordingly, Midwest will file its response to ACC's Complaint on January 22, 2020.

7. This stipulation is not made for purposes of delay.

DATED this 15th day of January, 2020.

Respectfully Submitted By:

GORDON REES SCULLY MANSUKHANI,
LLP

FENNEMORE CRAIG, P.C.

/s/ Dione C. Wrenn
ROBERT E. SCHUMACHER, ESQ.
Nevada Bar No. 7504
DIONE C. WRENN, ESQ.
Nevada Bar No. 13285
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101
Attorneys for Defendant
Midwest Family Mutual Insurance Co.

/s/ Chelsie A. Adams
JOHN RANDALL JEFFERIES, ESQ.
Nevada Bar No. 3512
BRANDI M. PLANET, ESQ.
Nevada Bar No. 11710
CHELSIE A. ADAMS, ESQ.
Nevada Bar No. 13058
300 South 4th Street, 14th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiff
Arizona Civil Constructors, Inc.

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE
DATED: January 21, 2020

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101